

### **REMARKS**

Claims 1, 5-8, 25, and 27-40 are pending in the present application. Claims 27, 30-32, and 37 have been amended. Claims 1, 27, 33, and 37 are independent claims. The Examiner is respectfully requested to reconsider the outstanding rejections in view of the above amendments and the following remarks.

#### ***Allowable Subject Matter***

It is gratefully acknowledged that the Examiner has allowed claims 1, 5-8, 25, and 33-36.

#### ***Rejection Under 35 U.S.C. § 112***

Claim 37 stands rejected under 35 U.S.C. § 112, 2<sup>nd</sup> Paragraph, as being indefinite. Particularly, the Examiner asserts that the phrase “before generating the plugin” is unclear because there is no longer any step of “generating the plugin” in the claim. Applicants point out that claim 37 has been amended above to replace the aforementioned phrase with “--before selecting the plugin--”, as suggested by the Examiner. Accordingly, Applicants request reconsideration and withdrawal of this rejection.

#### ***Rejections Under 35 U.S.C. § 103***

#### **Hughes/Dutta/Official Notice**

Claims 27, 29-32, and 37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,122,372 to Hughes (hereafter “Hughes”) in view of U.S. Patent No. 6,615,212 to Dutta et al. (hereafter “Dutta”) and the Examiner’s taking of Official Notice. This rejection, insofar as it pertains to the presently pending claims, is respectfully traversed.

### **Independent Claim 27**

As amended, independent claim 27 now recites that the first software envelope is generated in a markup language and includes fields for forward and return routing information. Amended claim 27 also recites that the first software envelope is formatted to allow an application in the destination location to automatically generate a reply software envelope suitable for delivery to the source by swapping the forward and return routing information in the respective fields of the first software envelope. Support for the above amendments can be found in the specification at, e.g., page 8, lines 7-9; page 10, lines 3-7; and Fig. 4. It is respectfully submitted that the cited references, taken alone or in combination, fail to teach or suggest these features.

In the rejection that the Examiner relies on Hughes to teach generating the first software envelope, citing Hughes at col. 6, lines 6-14. However, there is no teaching or suggestion that the encapsulated message format in Hughes contains either forward or return routing information. At most, Hughes teaches including recipient and sender identifiers in the encapsulated message (Fig. 2), which are for authenticating the recipient and sender, not for routing the message or response thereto. See col. 23, lines 30-55; col. 24, line 59 - col. 25, line 11.

As such, Hughes does not teach or suggest providing routing information fields in the encapsulated message. Accordingly, there is no teaching or suggestion in Hughes that the encapsulated message format would allow an application to create a reply envelope by swapping the forward and return routing information in their respective fields, as claimed. Further, it is respectfully submitted that neither Dutta nor the Examiner's taking of Official Notice remedies the aforementioned deficiencies of Hughes.

At least for reasons set forth above, Applicants believe that independent claim 27 is in condition for allowance. However, Applicants further point out that the Examiner is apparently interpreting the phrase "plugin" as reading on the template file disclosed in Hughes (see Office Action at page 4, asserting that Hughes teaches "selecting a plugin..." at col. 9, lines 25-32). Applicants respectfully submit that the Examiner's overbroad interpretation of "plugin" is improper

in view of the art-recognized meaning of that term. However, in an effort to expedite prosecution, Applicants have amended claim 27 to further distinguish the claimed plugin.

Particularly, claim 27 has further been amended to recite that the plugin includes executable code to provide to the application the functionality of creating the object from the markup language of the data file. This amendment is supported in the specification at, e.g., page 11, lines 19-21, taken in conjunction with the art-recognized meaning of the term “plugin.”

It is respectfully submitted that Hughes provides no teaching or suggestion that the template file includes executable code to be plugged into an application to implement a particular function. In fact, Hughes expressly provides a template example in col. 9, lines 32-34 and 47-50, which does not resemble an executable plugin. Thus, Hughes *teaches away* from the claimed “plugin.” Further, Applicants submit that neither Dutta nor the taking of Official Notice remedies this deficiency in Hughes.

At least for the reasons set forth above, Applicants submit that independent claim 27 is in condition for allowance. Accordingly, claims 29-32 are allowable at least by virtue of their dependency on claim 27.

### **Independent Claim 37**

Applicants respectfully submit that claim 37 has been amended to include similar language as discussed above in connection with claim 27.<sup>1</sup> Thus, it is respectfully submitted that claim 37 is allowable for reasons similar to those set forth above in connection with claim 27. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of claim 37.

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<sup>1</sup> Claim 37 has also been amended to recite that an identifier for the plugin, rather than plugin itself, is attached to the first software envelope. Support for this can be found in the specification at, e.g., page 11, lines 19-21.

**Hughes/Dutta/Official Notice/Lection**

Claim 28 stands rejected under § 103(a) as being unpatentable over Hughes, Dutta, the taking of Official Notice, in view of U.S. Patent No. 6,446,110 to Lection et al. (hereafter "Lection"). Applicants respectfully submit that Lection fails to remedy the deficiencies of Hughes, Dutta, and the taking of Official Notice set forth above with respect to independent claim 27. Particularly, the Examiner only relies on Lection to teach the use of XML markup language to generate a data file (see Office Action at page 6, last two paragraphs). Thus, Applicants respectfully submit that claim 28 is allowable at least by virtue of its dependency on claim 27.

***Conclusion***

In view of the above amendments and remarks, the Examiner is respectfully requested to reconsider the outstanding rejections and issue a Notice of Allowance in the present application.

Should the Examiner believe that any outstanding matters remain in the present application, the Examiner is respectfully requested to contact Jason W. Rhodes (Reg. No. 47,305) at the telephone number of the undersigned to discuss the present application in an effort to expedite prosecution.

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If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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